CASE # 47133-7-II

IN THE COURT OF APPEALS, DIVISION II

OF THE STATE OF WASHINGTON

FANNIE MAE aka FEDERAL NATIONAL MORTGAGE ASSOCIATION, Respondent,

V.

RONALD & KATHLEEN STEINMANN, Appellants.

APPEAL BRIEF

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STATEMENT OF THE CASE

This case was birthed in the throes of the Great Recession of 2008 through 2010. As such, the Steinmanns were victims of the fiasco created by subprime loans and the mishandling of their loan package by Mortgage Electronic Registration Services (MERS). As indicated in the previous Appeal, (Court of Appeals Division II Case No. 43133-5-II) they ceased making payments in 2009 so that they would qualify for the Home Affordable Modification Program (HAMP). While they were initially approved for the HAMP loan they were later disapproved based on wrong information inputed by the employees of IndyMac Mortgage Services.

They received a "Notice of Default" dated January 25, 2011. Their home which they had owned since 2001 was sold at a Trustee's Sale in foreclosure on June 24, 2011.

The earlier case came on first before the Trial Court, and then the Court of Appeals, as Fannie Mae attempted to evict the Steinmann's from their home following the Trustee's Sale through an Unlawful Detainer process. The Honorable Robert Lewis entered an Order granting Fannie Mae's Motion for Summary Judgment indicating that he had no genuine issue of material fact why they should not take possession.

The Court of Appeals Division II issued an Unpublished Opinion upholding the Trial Court's decision. It also awarded attorney's fees, which issue was appealed to the Washington State Supreme Court. That Court ruled in favor of Steinmanns denying the attorney's fees and remanding the matter to the Trial Court.

The case of Bavand v. One West Bank, 176 Wn. App. 475, 309 P.3d 636, (2013) was filed in Division I of the Washington State Court of Appeals the day before the Unpublished Opinion of Steinmanns case was filed in Division II, on September 10, 2013. In

fairness it should be noted that Steinmanns then made a Motion for Reconsideration and a collateral Motion for Adding Additional Evidence pursuant to RAP 9.11. Those Motions were denied without comment on March 4, 2014. (CP-108) Steinmanns then petitioned for review to the Washington State Supreme Court on the issue of the Motion for Reconsideration and the Motion to Add Additional Evidence and the issue of the award of attorney's fees. The Court's Opinion in the Supreme Court Case No. 90117-1 responded by saying "We grant review only on the issue of attorney's fees and vacate the award." There were no comments made at all on the Motion for Reconsideration or the Motion to Add Additional Evidence. The matter was then mandated back to the Trial Court "for further processing in accordance with the attached true copy of the Opinion." (CP 107)

It was not unexpected that the Motion for Additional Evidence on Review brought under RAP 9.11 would be rejected. It could have been rejected for any of six reasons although the reasons were not given by either the Court of Appeals, Division II or by the Washington Supreme Court. It is noted that subsection (b) of RAP 9.11 suggest that the Appellate Court will ordinarily direct a Trial

Court to take additional evidence. The simple denial of the Motion in the Appellate Court and the failure to review that denial in the Washington Supreme Court should have no impact on this Appeal.

Believing that neither Appellate Court has really addressed the implication of Bavand v. One West Bank, supra on the facts, Steinmanns then moved the Trial Court for an Order Granting Relief from Judgment under the CR 60(b) seeking Motion to Vacate the Order Granting Summary Judgment and presenting the troublesome documents. The Court entered a simplified Order Denying Steinmanns' Motion to Vacate (CP 119). In his oral ruling on the Steinamnns' Motion, the Court indicated that he felt the Motion was not timely because the evidence that was being sought to be presented could have been presented at the earlier chapter of the case. The fact that there was a new Appellate case making the evidence more meaningful wasn't enough for the Court to consider or countervailing the interest in finality of the case. (RP 7)

IV.

STANDARD OF REVIEW – MOTION TO VACATE JUDGMENT

The Standard of Review for an Appellate Court reviewing Motions to Vacate Judgment, generally speaking is deference to the Trial Court unless there is a manifest of abuse of discretion.

> "A motion to vacate a judgment is to be considered and decided by the trial court in the exercise of its discretion, and its decision should not be overturned on appeal unless it plainly appears that this discretion has been abused." Martin v. Pickering, 85 Wn. 2d 241, 245, 533 P.2d 380 (1975); In re the Guardianship of Admec, 100 Wn 2d 166, 667 P.2d 1085 (1983)

However, there are nuances that make that standard less than rigid, for example, In Re the Marriage of Hardt, 39 Wn App. 493, 693 P.2d 1386 (1985) the Court of Appeals held:

> "Proceedings to vacate judgments are equitable in nature and the court should exercise its authority liberally "to preserve substantial rights and do justice between the parties". Haller v. Wallis, 89 Wn. 2d 539, 543, 573 P.2d 1302 (1978); accord, Pamelin Industries, Inc. v. Sheen-U.S.A. Inc., 95 Wn 2d 398, 404, 622 P.2d 1270 (1981). The superior court's decision to vacate should be disturbed only upon a showing of clear or manifest abuse [citations omitted]

And yet another case is Pedersen's Fryer Farms, Inc. v. TransAmerica Insurance, 83 Wn App. 432, 922 P.2d 126 (1996). That Court held:

> "A trial court abuses its discretion when it is exercised on untenable grounds or for untenable reasons or when the discretionary act was manifestly unreasonable." [citation omitted] Pedersen's v. TransAmerica Insurance, supra page 454.

In Re the Marriage of Flanagan, 42 Wn. App. 214. 709 P2d 1247 (1985), provides yet another explanation of the abuse of discretion.

> "CR 60(b)(11) allows relief from a judgment for "[a]ny other reason justifying relief from the operation of the judgment." This rule is identical to Federal Rule of Civil Procedure 60(b)(6). The United States Supreme Court has held that this rule "vests power in Courts adequate to enable them to vacate judgments whenever such action is appropriate to accomplish justice." [citation omitted]
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> Washington has applied a similar standard to CR 60(b)(11) Motions. Use of the rule "should be confined to situations involving extraordinary circumstances not covered by any other section of the rule." State v. Keller, 32 Wn. App. 135, 140, 647 P.2d 35 (1982). "The circumstances must relate to "irregularities which are extraneous to the action of the court or go to the

question of the regularity of its proceedings"."
Marriage of Flanagan, supra page 221.

The same principles found in a non-divorce case are found in State v. Keller, supra and also on Marie's Blue Cheese v. Andre's Better Foods, Inc., 68 Wn. 2d 756, 415 P.2d 501, (1966). The latter case also cites Trautman, "Vacation and Correction of Judgments in Washington", 35 Wn. L. Rev. 505, 515.

V.

ARGUMENT

A. The Trial Court erred by failing to vacate the Judgment and in so doing abused its discretion.

The factual disputes emanates from documents found attached to the Affidavit of Brian H. Wolfe in support of Defendants Motion for Relief from Judgment. (CP 107) First, was the Appointment of Successor Trustee, which was signed on November 9, 2009, and recorded January 29, 2010.

The second document is the Assignment of Deed of Trust, which was signed a week later November 16, 2009 and recorded January 29, 2010.

Both documents were signed by a person named J.C. San Pedro. On November 9, 2009, he states that he is the employee of One West Bank, FSB when the Successor Trustee was appointed. On November 16, 2009 he states he is an employee of MERS, who was then a nominee for IndyMac Bank, FSB. There was never a new Appointment of a Successor Trustee. The Successor Trustee, Regional Trustee Services Corporation (RTS), conducted the Trustee's Sale on June 24, 2011. It is Steinmanns' position that RTS was without authority to conduct that sale since their appointment predated the Assignment of the Deed of Trust.

Further, there is question about who J.C. San Pedro really works for. In the Appointment of Successor Trustee, he claims to work for One West Bank and yet in the Assignment of the Deed of Trust signed one week later he was a representative or officer of MERS. That Assignment of Deed of Trust also assigned the Note or Notes. We know now from Bain v. Metropolitan Mortgage Group, Inc., 175 Wn 2d 83, 285 P3d 34 (2011) that MERS never holds the actual documents.

Steinmanns brought a Motion to Vacate Judgment and for New Trial and listed several reasons under CR 60(b) and CR 59 asking for a new trial.

Steinmann's included a Motion for a New Trial only to give the trial court the option to have an evidentiary hearing which has never happened in this matter.

Among other reasons, the citation of Steinmanns was for CR 60(b)(11) "any other reason justifying relief from the operation of the Judgment". The Trial Court believed that it needed to have this matter become "final", which leads to a discussion of the finality doctrine vs. the balance of the equalities. (RP 7)

1. Are their extraneous matters that allow Trial Court to vacate the Judgment evicting the Steinmanns from their home?

The lead case in Washington is the Marriage of Flanagan, 42 Wn. App. 214, 709 P.2d 1247 (1985), discussed above and which discussed the finality doctrine and the balancing of equalities when it came to the application of the Uniformed Services Former Spouses Protection Act (USFSPA). There was a decision in McCarty v. McCarty, 453 U.S. 210, 69 L.ed. 2d 589, 101 S.Ct. 2728, (1981), which

prohibited the state's divorce courts from distributing military retirement benefits. The USFSPA was enacted by Congress to cover that loop hole. The question was then: Is the new statute retroactive? After reviewing cases from several other states, it was concluded that the balancing of equities favored reopening over finality. The Court pointed out that two courts in other states have refused to open decrees because of the doctrine of finality, but stated:

> "However, in each case, the Court noted that finality was considered such an important doctrine in their state, that no CR 60(b)(11)-type rules had been created.
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> . . .
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> We have found no cases where the doctrine of finality prevailed over the inequity of denying retroactivity, so long as a procedural mechanism such as CR 60(b)(11) existed for retroactive application". Marriage of Flanagan, supra page 220.

This case seems to be the decision of a specific matter pertaining to divorce law but it cites two non-divorce cases to justify its rulings: State v. Keller, 32 Wn App. 135, 642 P.2d 35 (1982) and Marie's Blue Cheese Dressing, Inc. v. Andre's Better Foods, Inc., 68 Wn. 2d 756, 415 P.2d 501 (1966). In its conclusion, the Court of Appeals in the Flanagan case, stated the following reasoning:

> "[1] CR 60(b)(11), allows relief from a judgment for "any other reason justifying relief from the operation of the judgment". This rule is identical to the Federal Rule of Civil Procedure, 60(b)(6). The United States Supreme Court has held that this rule "vests power in a Court's adequacy to enable them to vacate Judgment whenever such action is appropriate to accomplish justice." [citations omitted]
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> . . .
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> Washington has applied a similar standard to CR 60(b)(11) motions. Use of the rule "should be confined to situations involving extraordinary circumstances not covered by any other section of the rule." State v. Keller, supra, pgs 140-141.

The bottom line of the Flanagan case was that they believed that the extraordinary circumstances prevailed over the doctrine of finality in the application of USFSPA. But they go on to say:

> "Motions for vacation or relief of a judgment under CR 60(b) are within the discretion of the trial court and will not be disturbed absent a clear abuse of discretion". Morgan v. Burks, 17 Wn. App. 193, 563 P.2d 1260 (1977). The discretion is abused when based on untenable grounds or reasons. Davis v. Globe Machinery Manufacturing Company, 102 Wn. 2.d 68, 684 P.2d 692 (1984). The denial of the Bossart motion to reopen was based on concerns about the "chaotic results" that retroactivity would cause. Because retroactive application is proper under these extraordinary circumstances, the grounds for denial are untenable and constitute

an abuse of discretion." Marriage of Flanagan, pages 222 and 223.

The principle of law stated best in State v. Keller, supra:

"CR 60(b) does not authorize vacation of judgments except for reasons extraneous to the action of the Court or for matters affecting the regularity of the proceedings, Marie's Blue Cheese Dressing, Inc. v. Andre's Better Foods, supra". State v. Keller, page 140.

The matter that is extraneous to the action of the Trial Court in the Steinmann matter is the coupling together of the ruling in Bavand v. One West Bank, supra, and the very similar factual irregularities of the documents, consisting of the Assignment of Note and Deed of Trust and the Appointment of a Successor Trustee in the wrong order. These matters were not before the Trial Court on its initial decision in the Plaintiff's Motion for Summary Judgment because Bavand had not yet been decided nor had there been any other case with similar conclusions. That is the effect the Bavand ruling could have on decisions regarding inappropriate appointment of successor trustees and the involvement of MERS in all of these transactions. Again, this is an effort to correct the inequities brought on by the fiasco caused by the banking industry leading up to the Great Recession.

B. The Trial Court erred by failing to balance the equities and applied the doctrine of finality.

It has been pointed out in this matter on numerous occasions that the Steinmanns come late to the game. While they made efforts on their own to obtain legal counsel, before the Trustee's Sale, they failed in that endeavor and were in court only on the resulting Unlawful Detainer matter following the Trustee's Sale. Even then it remained unclear as to the actual status of the Trustee, Regional Trustees Services Corporation, and the bank which appointed it.

1. Did Steinmanns waive their right to seek relief because of failing to bring a lawsuit before the Trustee's Sale.

Under most circumstances, the Steinmanns may have "waived" their right to complain, but Cox v. Helenius, 103 Wn 2d 383, 693 P.2d 683 (1995) provides respite. First, it points out that there are three basic objectives to the Deed of Trust Act including that the process should remain efficient and inexpensive and provide an adequate opportunity for interested parties to prevent a wrongful foreclosure. More importantly in this case, the process should promote the stability of land titles. If, in fact, the appointment of

Regional Trustee Services Corporation (RTS) created a **void** sale, then title to the property that is the Steinman property would be unstable at best. Plaintiff would not own the land and could not resell it. The Cox court held essentially that even if they had failed to properly restrain the Trustee's Sale, the trustee's actions would result in a **void sale**. Therefore the "doctrine of waiver" does not apply when the sale is **void**. That is affirmed in Schroeder v. Excelsior Management Group, LLC, 177, Wn. 2d 94, 297 P.3d 677 (2013) where the Washington Supreme Court reinforced the principle that waiver does not occur where the Trustee's actions in a non-judicial foreclosure sale are unlawful. In Klem v. Washington Mutual Bank, 176 Wn. 2d 771, 295 P.3d 1179 (2013), the Supreme Court concluded that waiver is an equitable doctrine. It held:

> ". . . [we] apply waiver only where it is equitable under the circumstances and where it serves the goals of the act." See also Albice v. Premier Mortgage Services of Washington, Inc., 174 Wn. 2d 560, 276 P.3d 1277 (2012).
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> Klem v. Washington Mutual Bank, supra page 783 (n7).

2. Is the extraneous but nearly identical fact pattern of Bavand significantly extraordinary to justify vacating the Steinmann Judgment?

That brings us to the case of Bavand v. One West Bank, 176 Wn. App. 475, 309 P.3d 636 (2013). This is a Division I case, the opinion of which was released the day before the Unpublished Opinion of Steinmann matter was released. The factual similarities between the Bavand matter and the Steinman matter are incredulous. In 2007, Marisa Bavand obtained a loan for $722,950.00 dollars from IndyMac Bank, FSB. It named MERS as the "beneficiary under the security instrument" and "nominee for the lender". On December 15, 2010, One West Bank, FSB claiming to be the present beneficiary of Bavand's Deed of Trust executed the Appointment of Successor Trustee. On December 16, 2010, one day after the reported appointment of RTS as successor trustee, MERS executed an Assignment of Deed of Trust which stated that it acted as "nominee for IndyMac Bank, FSB". RTS then commenced and concluded a non-judicial foreclosure proceeding on the Deed of Trust.

In the Steinmann matter, there was an Appointment of Successor Trustee, signed in Texas on November 9, 2009, by J.C. San

Pedro affirming that he works for One West Bank FSB and he appointed Regional Trustee Services (RTS) as the successor trustee. Then on November 16, 2009, a document entitled Assignment of Deed of Trust, was signed again by J.C. San Pedro, then stating he was an employee of MERS and the document provided that Mortgage Electronic Registration Systems, Inc. as nominee for Indy Mac Bank FSB, a federal chartered savings bank, assigned all beneficial interest to One West Bank, FSB.

As the Bavand case points out, the only reasonable reading of the statute then in existence as the Deed of Trust Act (RCW 61.24.010) is that the successor trustee must be properly appointed to have powers of the original trustee. Division I concluded that One West Bank was not the beneficiary of the Deed of Trust at the time it attempted to appoint a successor trustee, and had no authority under the above statute to appoint Regional Trustee Services as successor trustee. Since RTS was not properly appointed it has no authority to conduct the foreclosure and Trustee's sale of Bavand's property. Likewise it should not have conducted a foreclosure sale on the Steinmann property.

The Bavand case further has a discourse over the relationship of MERS to this litigation and to the effectiveness of the Trustee's Sale. Using Bain v. Metropolitan Mortgage Group, Inc., supra, it concluded that MERS was not the proper beneficiary under the Deeds of Trust Act. It must actually be a "holder" of the Note or other secured obligation and since it is a consortium of mortgage investment companies, and does work only electronically it is not and never had been a holder of the Note. It was not a holder of the Note in the Bavand case and could not be a holder of the Note in the Steinmann case.

On top of that, the Appointment of a Successor Trustee by One West Bank represents that it was the "present beneficiary" of the Bavand Deed of Trust but the records shows that was not true. On the date of the appointment, MERS was the named beneficiary on the instrument. But MERS cannot appoint the successor trustee because it cannot hold the Note, it cannot be a beneficiary under the Washington Deed of Trust Act. The same would be true for MERS and One West Bank and Regional Trustees Services in the Steinmann matter which was processed at approximately the same time as the Bavand matters were processed. As the Supreme Court concluded in

Bain, "if MERS never held the Promissory Note, then it is not a lawful beneficiary".

It should be clear that reversing the order of the two documents is an extraneous fact to the eviction of the Steinmanns by Plaintiffs. Those two documents and the impact of MERS and the questionable authority of the signer of the documents when coupled with the Bavand opinion should be enough to vacate the judgment of eviction.

C. The Trial Court erred by failing to address the issue of whether the Trustee's Sale was **void**.

1. The failure to submit the critical documents at the time of Fannie Mae's initial Motion for Summary Judgment is not fatal the Steinmanns position.

The argument will be made that the two offending documents were recorded with the Clark County Auditor in 2011 and therefore were available for review by Steinmanns and the Court during the initial run up to Plaintiff's original Motion for Summary Judgment. While that may be true, it must be understood that the relevance of the reverse order of signing of those documents made no sense until

the entry of the Opinion in the Bavand case, supra. In that, and the cases cited therein, it is made clear that an unlawful Trustee's Sale or a process where the trustee's actions are unlawful, the sale is **void.** Bavand v. One West Bank, supra at page 492 and Cox v. Helenius, supra, pages 388-389. In those cases the result was there is no waiver of the right to seek and obtain relief.

Waiver based on failure to file a pre-sale lawsuit or obtain a valid TRO is distinguishable for a **void** sale based on the sale itself being unlawful. If the sale is truly **"void"** then any effort to ratify that **void** sale must be rejected regardless of the timeliness of the evidence or the reasonableness of the time that might have elapsed.

An analogous principle is in the vacation of judgments that are **void**. The case of State ex rel Turner v. Briggs, 94 Wn App. 299, 971 P.2d 581 (1999) has a reasonably good discussion on that principle. In that case, the Steinmanns argued that there was no compliance with CR 2A in the entry of a settlement to stipulate paternity and child support. His attorney had done that allegedly without the client's authority and the client was not present in the court room. The court first ruled:

> "A **void** judgment is a "judgment, decree or order entered by a court which lacks

> jurisdiction of the parties, or of the subject matter, or which lacks the inherent power to make or enter the particular Order involved ..." Dike v. Dike, 75 Wn. 2d 1, 7, 448 P.2d 490 (1968).
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> . . .
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> . . . In contrast, a **void** order is **void** from its inception and can be vacated without regard to the passage of time. In Re the Marriage of Leslie, 112 Wn 2d 612, 618-619, 772 P.2d 1013 (1989)
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> State ex rel Turner v. Briggs supra page 302 and 305.

It was pointed out in this case that if the CR 2A requirements are not followed religiously, the resulting judgment is **void** and may be challenged and vacated at any time. It cited Long v. Harrold, 76 Wn. 317, 884 P.2d 934 (1994). Based on this legal analysis, one can only conclude that the failure to bring forward the offending documents at the time of the initial Motion for Summary Judgment, it not fatal. They only make sense when tied together with the Bavand opinion, which was not available at the time of the initial Motion for Summary Judgment. Accordingly it is never too late.

2. If the Trustee's Sale was truly **void** because something in the foreclosure process was unlawful, wouldn't any order affirming that **void** sale be **void** also?

The Bavand case goes on to quote two other recent cases, Albice v. Premier Mortgage Services of Washington, Inc., 174 Wn. 2d 560, 276 P.3d 1277 (2012) and Frizzell v. Murray, 170 Wn App. 420, 283 P.3d 1139 (2012). The first points out that the statute then applicable, RCW 61.24.040(1)(f)(ix), states that failure to bring a lawsuit may result in a waiver of any proper grounds for invalidating the Trustee's Sale. In the Frizzell case, there was a civil suit but no attempt to pay the bond to secure a TRO as required by RCW 61.24.130. In the Albice case, the Washington Supreme Court indicated that waiver under the Deeds of Trust Act is not to be rigidly applied. In the Frizzell case, Division II Court of Appeals states: "we apply waiver only where it is equitable under the circumstances and where it serves the [Deeds of Trust Act goals]. Borrowing from the Albice decision, the Frizzell court concluded:

> "[t]he legislatures use of "may" in this statute neither requires nor intends to strictly apply waiver rules; so under this statute, we apply waiver only where it is

> equitable under the circumstances and serves the [Deed of Trust Act's] goals." Frizzell v. Murray, supra, page 427.

That brings us full circle back to the issues discussed above regarding the differences between the balance of equities and finality doctrine. In Re the Marriage of Flanagan supra, states the principle best:

> "CR 60(b)(11) allows relief from a judgment for any other reason justifying relief from the operation of the judgment." This rule is identical to the Federal Rule of Civil Procedure 60(b)(6). The United States Supreme Court has held that this rule "best powers in court's adequate to enable them to vacate judgments whenever such action is appropriate to accomplish justice." [citation omitted]

In Re Marriage of Hardt, 39 Wn. App. 493, 693 P.2d 1386 (1985) asserts:

> "Proceedings to vacate judgments are equitable in nature and the court should exercise its authority liberally "to preserve substantial rights and do justice between the parties." In Re Marriage of Hardt, supra page 496.

If it is by precedential edict in case law that an addressing waiver, the Court's must apply "equity" and if that equity balances the

justice between the parties, then it can only be concluded that the decision of the Trial Court to deny the Motions to Vacate do not balance those same equities. Thus the Trial Court's failure to vacate the judgment and perhaps reopen the matter for evidentiary hearings was an abuse of discretion.

VI.

CONCLUSION

Clearly there are many equities to balance in this matter and justice to be had. As indicated at the beginning, this is one of those foreclosures that arise out of the morass or choas caused by the banking industry during the Great Recession. Things got careless in the subprime loan field. MERS was created which lead to electronic transfers but no "holder" of the actual Promissory Note and Deed of Trust. Carelessness lead to forged notaries, bulk notarial seals, and the signature of one person representing to be employed by two different entities, in addition to the fact that, like in Bavand, the

Steinmanns Assignment of Note and Deed of Trust was reversed with the Appointment of Successor Trustee.

The case law cited above clearly stated that a court has the duty to balance the equities rather than adopt the doctrine of finality where there are extraneous circumstances that justify doing justice. It would be unjust for the Steinmanns to be evicted from their home when the actions of the banks and MERS were unlawful which lead to a **void** sale. The trial court must be ordered to review all that evidentiary material to determine that the sale was **void**. If it was void, then the title that Plaintiff Fannie Mae now holds is unclear and well may be unlawful. This is one of the three principles of the Deed of Trust Act, i.e. stability of title.

Simply applying the doctrine of finality does not stabilize that title nor does it do justice to the Steinmann's position. Several cases cited above indicate that waiver by failure to file a lawsuit prior to a Trustee's Sale only applies if it is equitable. Certainly the question of the lawfulness of the two documents in question must be done with equity in mind. Thus stated the Trial Court must be found to have abused its discretion by applying the doctrine of finality instead of

balancing the equities and that conclusion is untenable and constitutes an abuse of discretion.

Dated this 9th day of April, 2015

BRIAN H. WOLFE, P.C.

By: _____
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CERTIFICATE OF SERVICE

I hereby certify that I have mailed the Appeal Brief on the following attorney on the date noted below, by mailing to said attorney a true copy thereof, certified by me as such, contained in a sealed envelope, addressed to said attorney at their last known addresses as indicated, and deposited in the Post Office at Vancouver, Washington, on said day and e-mailing the same the date below signed.

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DATED this 9th day of April, 2015.

BRIAN H. WOLFE, P.C.

By: Roberta Woelke
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